UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

IN RE:) 20-00477	
)	
Tyra Kennedy-Winston,) Chapter 13	
)	
Debtor(s).) Hon. Judge	CASSLING
)	

NOTICE OF OBJECTION TO DEBTOR'S OBJECTION TO CLAIM NO. 15 (MARY CATHERINE HICKS)

Secured Creditor, Mary Catherine Hicks ("Creditor"), in the above-captioned Chapter 13 case of Tyra Kennedy-Winston ("Debtor"), by and through her attorneys, Segal McCambridge Singer & Mahoney, Ltd., respectfully submits this notice of objection ("Notice") to Debtor's *Objection to Claim No. 15 (Mary Catherine Hicks)* ("Objection"). In support of her Notice, Creditor states as follows:

- 1. Debtor filed a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code (Case No. 20-00477) on January 8, 2020. *See* Doc. No. 1.
- 2. On March 30, 2020, Debtor filed the Objection to Creditor's Secured Claim, on the basis that, among others, there was no attachment showing the Judgment was recorded against Debtor. *See* Doc. No. 28.
- 3. On April 16, 2020, Debtor filed *Creditor's Response to Debtor's Objection to Claim No. 15 (Mary Catherine Hicks)* ("Response"). See Doc. No. 35.
- 4. Upon further review of the Objection, Creditor became aware that the Notice of Motion attached to the Objection requires a party who objects and "wants it called [to] file a Notice of Objection." Creditor files this Notice in an abundance of caution and to ensure that all procedures are followed in order for the Objection and Creditor's Response to be called on the

presentment date of April 30, 2020 at 9:30 AM, as stated in the Notice of Motion. *See* Exhibit 1, Creditor's Response.

WHEREFORE, Creditor, Mary Catherine Hicks, submits this Notice of Objection to this Honorable Court.

Respectfully submitted,

SEGAL McCAMBRIDGE SINGER & MAHONEY, LTD.

By: <u>/s/ Taofikat I. Ninalowo</u>

Patrick F. Sullivan, Esq. – ARDC #1119709

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SEGAL McCAMBRIDGE SINGER & MAHONEY, LTD.

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Attorneys for Secured Creditor, Mary Catherine Hicks

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

IN RE:) 20-004	477
)	
TYRA KENNEDY-WINSTON,) Chapt	er 13
)	
Debtor(s).) Hon. J	Judge CASSLING
)	

CERTIFICATE OF SERVICE

I, a non-attorney, certify that a true and accurate copy of the foregoing previously filed **Response** to **Debtor's Objection to Claim No. 15 (Mary Catherine Hicks) Doc. 35 and Doc 35-1**, was served upon the following parties in the following fashion on **April 24, 2020**:

To Debtor:

Tyra Kennedy-Winston 729 N. Parkside Ave. Chicgo, IL 60644

By U.S. Mail

To Attorney:
David M Siegel
David M. Siegel & Associates
790 Chaddick Drive
Wheeling, IL 60090
By Electronic Notice through ECF

To Trustee:
Tom Vaughn
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
By Electronic Notice through ECF

U.S. Trustee
Patrick S. Layng
Office of the U.S. Trustee, Region 11
219 S. Dearborn St.
Room 873
Chicago, IL 60604

By Electronic Notice through ECF

By: _____/s/ Mirna Colon_____

Under penalties as provided by law pursuant to ILL REV STAT. CHAP. 110 § 1-109, I certify that the statements set forth are true and correct.

SERVICE LIST Entered 04/24/20 13:02:02 Label Matrix for local noticing Doc 41 Filed 04/24/20 Desc Main Page 4 of 7 Eastern Division Bankruptcy Department Case 20-00477 219 S Dearborn 5407 Andrew Highway Northern District of Illinois 7th Floor Midland, TX 79706-3615 Eastern Division Chicago, IL 60604-1702 Fri Apr 24 11:12:49 CDT 2020 Ability Recovery Servi American Homeshield Arnold Scott Harris, P.C. Pob 4031 889 Ridge Lake Blvd 111 W. Jackson Blvd. Ste. 600 Wyoming, PA 18644-0031 Memphis, TN 38120-9425 Chicago, IL 60604-3517 (p) CAPITAL ONE Cash Net USA City of Chicago PO BOX 30285 200 West Jackson Dept of Water Management SALT LAKE CITY UT 84130-0285 Suite 1400 PO Box 6330 Chicago, IL 60606-6929 Chicago, IL 60680-6330 City of Chicago City of Chicago Department City of Chicago Department of Finance Dept. of Revenue Of Administrative Hearing c/o Arnold Scott Harris P.C. City of Chicago - DOAH C/O Arnold Scott PO Box 88292 111 W. Jackson Ste. 600 Chicago, IL 60680-1292 111 W. Jackson Ste 600 Chicago, IL 60604-3517 Chicago, IL 60604-3517 City of Chicago Red Light Camera City of Chicago Department of Law-Bankruptcy City of Chicago Parking 121 N La Salle St., 121 N LaSalle Street PO Box 8073 Chicago, IL 60680-8073 Suite 400 Room 107A Chicago, Illinois - IL 60602-1264 Chicago, IL 60602-1232 City of Chicago, Illinois Codilis & Associates Commonwealth Edison Company Dept. of Administrative Hearings 15W030 N. Frontage Rd. Bankruptcy Department 1919 Swift Drive 400 W. Superior Suite 100 Chicago, IL 60654-3409 Burr Ridge, IL 60527-6921 Oak Brook Terrace, IL 60523-1502 Commonwealth Edison-Care Center Credit One Bankruptcy Department Bankrupcty Department PO Box 6113 PO Box 98873 Oak Brook, IL 60523-1502 Carol Stream, IL 60197-6113 Las Vegas, NV 89193-8873

Commonwealth Edison Company Bankruptcy Department 1919 Swift Drive

Dept of Ed/Nelnet 3015 Parker Road Suite 400

Aurora, CO 80014-2904

Elite Rehab Institute 1100 Lake St Oak Park, IL 60301-1015 Enhanced Recovery Co L Po Box 57547

GREENWOOD VILLAGE CO 80155-6550

(p) DIRECTV LLC

PO BOX 6550

ATTN BANKRUPTCIES

Jacksonville, FL 32241-7547

First Premier Bank Bankruptcy Department PO Box 5523 Sioux Falls, SD 57117-5523

Directv, LLC by American InfoSource as agent 4515 N Santa Fe Ave Oklahoma City, OK 73118-7901

Epmg Of Il-Oak Park 3 Erie Ct Oak Park, IL 60302-2519

Heller and Frisone, LTD. Attorneys and Counselors 200 West Monroe St., Ste 660 Chicago, IL 60606-5057

First Premier Bank 3820 N Louise Ave

Sioux Falls, SD 57107-0145

ICL Titling Trust Xchange Leasing 795 Folsom St. Suite 1114 San Francisco, CA 94107-1243

Internal Revenue Service Page 5 of 7 P.O. Box 7346 Philadelphia, PA 19101-7346

Doc 41 IRS Filed 04/24/20 Entered 04/24/20 13:02:02 Desc Main REVENUE BANKRUPTCY UNIT PO BOX 19035 SPRINGFIELD IL 62794-9035

Illinois Tollway Attn: Attorney General Legal Dept. 2700 Ogden Ave. Downers Grove, IL 60515-1703

Illinois Tollway PO Box 5544 Chicago, IL 60680-5491

(p) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999

LVNV Funding PO Box 10587 Greenville, SC 29603-0587 LVNV Funding, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587

Lend Up 237 Kearny St. Suite 372 San Francisco, CA 94108-4502

Loyola Physicians Epic Two Westbrook Corporate Center Suite 600 Westchester, IL 60154-5716

Loyola Univ Physician PO Box 88049 Chicago, IL 60680-1049 Loyola University Hospital 2160 S. 1st Ave Maywood, IL 60153-5500

Lvnv Funding Llc Po Box 1269 Greenville, SC 29602-1269 MHC Receivables, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587

Mandarich Law Group, LLP 420 N WABASH AVE Suite 400 Chicago, IL 60611-3542

Manley Deas Kochalski, LLC One East Wacker Drive Suite 1250 Chicago, IL 60601-1980

Manor Resources c/o Peitus Portfolio Services PO box 141419 Irving, TX 75014-1419

Mary Catherine Hicks Segal McCambridge Singer & Mahoney, Ltd. 233 S. Wacker Drive, Suite #5500 Chicago, IL 60606-6366

Mary Catherine Hicks/Besma Fakhri c/o Segal Mccambridge Singer 233 S. Wacker Drive, #5500 Chicago, IL 60606-6366

MetroMile Insurance Services LLC 292 Townsend Street San Francisco, CA 94107-1719

Mr. Cooper Mortgage/Nationstar 8950 Cypress Waters Blvd Coppell, TX 75019-4620

NCO Financial Systems, Inc. 600 Holiday Plaza Drive Suite 300 Matteson, IL 60443-2238

(p) NATIONWIDE CREDIT AND COLLECTION INC ATTN BOB BECK 815 COMMERCE DR SUITE - 270 OAK BROOK IL 60523-8852

Oasis Legal Finance, LLC 9525 Bryn Mawr, Ste. 900 Suite 900 Rosemont, IL 60018-5264

Ocwen Loan Servicing/US Bank Bankruptcy Department PO BOX 24605 West Palm Beach, FL 33416-4605 PEOPLES GAS LIGHT & COKE COMPANY 200 EAST RANDOLPH STREET CHICAGO, ILLINOIS 60601-6433

Peoples Gas Bankruptcy Department 200 E. Randolph Street Chicago, IL 60601-6302

(p) PHOENIX FINANCIAL SERVICES LLC PO BOX 361450 INDIANAPOLIS IN 46236-1450

(p) PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067

Premier Bankcard, Llc Jefferson Capital Systems LLC Assignee Po Box 7999 Saint Cloud Mn 56302-7999

Case 20-00477 SYNCB/Pay Pal Bankrupcty Notice PO Box 5138 Timonium, MD 21094-5138

c/o Weinstein Riley, Page 6 of 7 2001 Western Ave., Ste 400 Seattle, WA 98121-3132

Doc 41 Filed 04/24/20 Entered 04/24/20 13:02:02 Desc Main Safety & Financial Responsibility 2701 South Dirksen Parkway Springfield, IL 62723-1000

Secretary of State License Renewal 3701 Winchester Road Springfield, IL 62707-9700

Thomas F. Courtney & Assoc. Attorneys at Law 7000 W. 127th Street Palos Heights, IL 60463-1558

Turbo Title Loans 33 N LaSalle St Suite 1300 Chicago, IL 60602-3414

U.S. Bank National Association PHH Mortgage Attn: Bankruptcy Department PO BOX 24605 West Palm Beach, FL 33416-4605 U.S. Bank National Association, as Trustee, c/o McCalla Raymer Leibert Pierce, LLC Bankruptcy Department 1 N. Dearborn Suite 1200 Chicago, IL 60602-4337

U.S. Bank National Association, et. al. Bankruptcy Department P.O. Box 619096 Dallas, TX 75261-9096

Village of River Forest 400 Park Ave River Forest, IL 60305-1798 Weinstein, Pinson & Riley, PS 2001 Western Ave Suite 400 Seattle, WA 98121-3132

Western Open Mri 20 Kingston Dr Oak Brook, IL 60523-1739

XChange Titling Trust, LLC 6400 Main Street Amherst, New York 14221-5858 David M Siegel David M. Siegel & Associates 790 Chaddick Drive Wheeling, IL 60090-6005

Patrick S Layng Office of the U.S. Trustee, Region 11 219 S Dearborn St Room 873 Chicago, IL 60604-2027

Tom Vaughn 55 E. Monroe Street, Suite 3850 Chicago, IL 60603-5764

Tyra Kennedy-Winston 729 N. Parkside Ave. Chicago, IL 60644-1151

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One 15000 Capital One Dr Richmond, VA 23238

DirecTV PO Box 9001069 Louisville, KY 40290-1069

Illinois Department of Revenue Bankruptcy Department PO Box 19035 Springfield, IL 62794

Jeffersncp (Jefferson Capital Syste Bankruptcy Department 16 McLeland Rd. Saint Cloud, MN 56303

Nationwide Credit & Co 815 Commerce Dr Ste 270 Oak Brook, IL 60523

Phoenix Financial Service 8902 Otis Ave Suite 103A Indianapolis, IN 46216

Portfolio Recovery Associates 120 Corporate Blvd., Ste. 100 Norfolk, VA 23502

(d)Portfolio Recovery Associates, LLC c/o Capital One Bank (usa), N.a. POB 41067 Norfolk VA 23541

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Nationstar Mortgage LLC d/b/a Mr. Cooper

(u) U.S. Bank National Association, as Trustee c/o Codilis & Associates, P.C. 15W030 North Frontage Road, Suite 100 Burr Ridge60527

(u)U.S. Bank National Association, as Trustee

(d) First Premier Bank 3820 N. Louise Ave. Sioux Falls, SD 57107-0145 (u) Mary Catherine Hicks/Taofikat I. Ninalowo

(u) Mary Catherine Hicks

End of Label Matrix

Total

Mailable recipients 76 Bypassed recipients

6 82